

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

**In re: Ralph E. and Tammy L. Schwartz, Debtor**

**CHAPTER 13**

**CASE NO. 11-31580-DOT**

Tammy L. Schwartz, Individually

**Carl Bates, ESQUIRE, TRUSTEE**

**Defendants**

**JOINT DEBTOR'S MOTION FOR BIFURCATION OF CASE**

Comes Now, Joint Debtor, Tammy L. Schwartz, solely, and makes motion that this case be bifurcated and that she be allowed to continue in an individual chapter 13. As grounds for this motion, Tammy L. Schwartz states as follows:

1. The debtors, Ralph and Tammy Schwartz, are currently separated and plan to divorce.
2. Tammy Schwartz best interests are not being served by the terms of the current chapter 13 plan in this case and, in order to meet her current needs in the case, she believes it is in her best interest to be in an individual chapter 13 case.
3. TAMMY L. SHWARTZ

By: /s/ Ellen P. Ray  
Ellen P. Ray

We ask for this:

/s/ Ellen P. Ray  
Ellen P. Ray, Esq.  
1701 W. Main Street  
Richmond, VA 23220  
(804) 355-1800  
Va. Bar No. 32286

/s/ Tammy L. Schwartz  
Tammy L. Schwartz  
Joint Debtor

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Motion for Bifarcation of Case was mailed, by first class mail, or sent electronically, this 13th day of May, 2013, to Carl Bates, Trustee, PO Box 1819, Richmond, VA, 23218-1819; Hartley Roush, Esq. 9830 Lori Road, PO Box 1839, Chesterfield, VA 23832 and all other parties of interest pursuant to Local Rule 9022 and as listed on the attached list of creditors.

/s/ Ellen P. Ray  
Ellen P. Ray

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

**In re: Tammy L. Schwartz, DEBTOR**

**CHAPTER 13  
CASE NO. 11-31580-DOT**

**Carl Bates, ESQUIRE, TRUSTEE**

**Defendants**

**NOTICE OF MOTION**

**\*\*Notice of Motion\*\***

Tammy L. Schwartz, Debtor, has filed papers with the Court to bifurcate her chapter 13 from the now joint case with her husband..

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the Court to grant the objection to claim, or if you want the Court to consider your view on the motion, then on or before June 3, 2013, you or your attorney must:

File with the Court, at the address shown below, a written response pursuant to Fed. Rules of Bankruptcy Procedure Section 2002(a)(2) and Local Bankruptcy Rule 9013. If you mail your response to the court for filing, you must mail it early enough so the Court will **receive** it on or before the date stated above.

Clerk of Court  
United States Bankruptcy Court  
701 E. Broad Street, Rm 4000  
Richmond, VA 23219

You must also mail a copy to:

Attorney for Debtor  
Ellen P. Ray  
1701 W. Main Street  
Richmond, VA 23220

**No Hearing has been set on this matter. If a timely objection or response to this motion is filed then a hearing will be set at the United States Bankruptcy Court, 701 E. Broad Street, Rm 5000, Richmond, VA 23219. No appearance is necessary unless you have filed a written response to this motion and are objecting to the granting of the motion by the Court.**

If you or your attorney do not take these steps, the Court may decide that you do not oppose the motion.

\_\_\_\_\_/s/ Ellen P. Ray

Ellen P. Ray, Esquire  
1701 W. Main Street  
Richmond, VA 23220  
(804) 355-1800  
Va. State Bar No. 32286

Date: 5-13-2013

Certificate of Service

I certify that a copy of the foregoing Notice of Motion was mailed, by first class mail, or sent electronically, the 13<sup>th</sup> day of May, 2013, to the following parties:

Office of the US Trustee  
701 E. Broad Street, Rm 4304  
Richmond, VA 23219

Carl Bates, Trustee  
P.O. Box 1819  
Richmond, VA 23218-1819

Ralph E. Schwartz  
8311 Roxbury Road  
Charles City, VA 23030

Hartley Roush, Esq.  
9830 Lori Rd.  
PO Box 1839  
Chesterfield, VA 23832

/s/ Ellen P. Ray

Case 1:11-31580-KLP  
Office of the US Trustee  
701 E. Broad Street, Ste 4304  
Richmond, VA 23219

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Check City  
Collections Dept  
PO Box 970183  
Orem, UT 84097

Schwartz, Tammy - 11-31580  
Omni Credit Services  
333 Bishops Way Ste 100  
Chesterfield, MO 63005-6209

AFNI  
PO Box 3427  
Bloomington, IL 61702-3427

Commonwealth Radiology, PC  
1508 Willow Lawn Dr, Ste 117  
Richmond, VA 23230

Palisades Collections  
210 Sylvan Avenue  
Englewood Cliffs, NJ 07632-2524

Allied Cash Advance  
11 S. Airport Drive Unit2  
Henrico, VA 23075

Credit Adjustment Board  
306 East Grace Street  
Richmond, VA 23219

Radiology Assocs of Richmond  
2602 Buford Rd.  
Richmond, VA 23235

Alltel  
P.O. Box 8130  
Little Rock, AR 72203-8103

DirectTV  
PO Box 6550  
Englewood, CO 80155

Regional Acceptance Corp  
PO Box 830913  
Birmingham, AL 35283

Appomatox Regional Library  
209 E. Cawson Street  
Hopewell, VA 23860

Fidelity Properties  
220 E. Main Street  
Pacific Palisades, CA 90272

Tansworld Systems  
1608 Spring Hill Rd. #100  
Vienna, VA 22182

Aqua Finance, Inc  
P.O. Box 101928  
Dept 612  
Birmingham, AL 35210

Focused Recovery Solutions  
9701 Metropolitan Court  
Suite B  
Richmond, VA 23236

Unique National Collections  
119 E. Maple St.  
Jeffersonville, IN 47130

Balance and Ear Center  
10200 Three Chopt Rd.  
Henrico, VA 23233

Hanover Emergency Associates  
PO Box 2080  
Kilmarnock, VA 22482

Virginia Emergency Physicians  
75 Remittance Drive #1151  
Chicago, IL 60675-1151

Bierman, Geesing & Ward, LLC  
4520 East West Highway,  
Suite 200  
Bethesda, MD 20814

John Randolph Medical Center  
PO Box 740760  
Cincinnati, OH 45274-0760

West Asset Managment  
PO Box 790113  
Saint Louis, MO 63179

Capio Partners, LLC  
2222 Texoma Pkwy Ste 150  
Sherman, TX 75090

Mason Easy Pay  
PO Box 77001  
Madison, WI 53707

Chase Home Finance  
PO Box 78116  
Phoenix, AZ 85062-8116

NCO Financial Services  
507 Prudential Road  
Horsham, PA 19044